

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DALLAS GARCIA, Individually and as §
A representative of the Estate of FRED §
HARRIS, deceased, §
Plaintiff, §
§
v. § Civil Action No.: 4:22-cv-3093
§
HARRIS COUNTY, TX. and HARRIS §
COUNTY SHERIFF'S OFFICE, §
Defendants. §

RULE 29 STIPULATION REGARDING WRITTEN DISCOVERY

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant HARRIS COUNTY files this its Rule 29 Stipulation Regarding Written Discovery and would respectfully show the Court as follows:

1. Plaintiff served Defendant with written discovery (interrogatories and requests for production) on or about January 17, 2023. Defendant's responses were due on or by February 16, 2023.
2. Undersigned conferred with Plaintiff's counsel, via email, regarding a 7-day extension of time to respond to the written discovery. Plaintiff's counsel is unopposed to said extension.
3. The parties hereby stipulate that Defendant has until February 23, 2023 to respond to Plaintiff's Interrogatories and Request for Production in the above referenced lawsuit.

Respectfully submitted,

OF COUNSEL:

CHRISTIAN MENEFEE
TEXAS BAR NO. 24088049
HARRIS COUNTY ATTORNEY

Date: February 13, 2023.

By: /s/ Jennifer F. Callan
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Attorneys for Defendant Harris County

CERTIFICATE OF SERVICE

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon each party to this cause on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on the following:

Randall Kallinen
Alexander Johnson
Kallinen Law, PLLC
511 Broadway Street
Houston, TX 77012

/s/ Jennifer F. Callan
Jennifer F. Callan